

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

IN RE: Valsartan N-Nitrosodimethylamine (NDMA), and Irbesartan Products Liability Litigation	MDL No. 2875 Civil No.: 19-02875 (RBK)
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**NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF GEORGIA FATIGATO**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Solco Healthcare U.S., LLC, Huahai U.S., Inc., and Prinston Pharmaceutical Inc. will take the deposition upon oral examination of Georgia Fatigato on December 7, 2021 at 11:00 a.m. EST, and continuing until completion, via remote deposition while the witness is at the Holiday Inn Express & Suites Romeoville - Joliet North, 722 Center Boulevard, Romeoville, IL 60446.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and

videographer will be an employee or agent of Veritext Legal Solutions (“Veritext”). Counsel who wish to attend remotely should contact Veritext at valsartan@veritext.com to arrange for login credentials to be sent to them prior to the deposition.

The attorney contact for the deposition is:

Alyson Walker Lotman
Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
(215) 979-1177
ALotman@duanemorris.com

Date: December 1, 2021

Respectfully submitted,

s/ Alyson Walker Lotman
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of December, 2021, a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Plaintiff Georgia Fatigato was served upon the following by e-mail, with copies to all defense counsel of record via CM/ECF:

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Veritext Legal Solutions (via email)

s/ Alyson Walker Lotman
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